

**REMARKS**

Claims 1-40 were pending in the application. Claims 3 and 25 have been amended. Claims 33-40 have been cancelled. Claims 41 and 42 have been added. Claims 1-32 and 41-42 therefore are now pending in the application.

**35 U.S.C. § 121 Restriction**

The Examiner asserted a requirement for election of species under 35 U.S.C. 121. During a telephone conversation with the Examiner on November 30, 2004, Applicant made a provisional election without traverse electing Group I from the list of inventions presented by the Examiner. Applicant affirms the election without traverse of Group I.

**35 U.S.C. § 103 Restriction**

Claims 1-31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Doblar et al. (U.S. Patent No. 6,922,342) in view of Kaplan et al. (U.S. Patent No. 6,680,904) and Branscomb (U.S. Patent No. 6,930,890). Applicant respectfully traverses this rejection.

Applicant respectfully submits that Doblar, Kaplan, and Branscomb, whether alone or combined, fail to teach or suggest, “a plurality of shelves, each shelf having a carrier for removably receiving a plurality of information processing modules and a switching module” and “wherein the shelves are logically connected into a plurality of stacks, the switching modules of the respective shelves in each stack being interconnected in a logical stacking configuration” as recited by claim 1.

The Examiner contends that FIGS. 10-11B of Doblar teach the above-highlighted features of claim 1. Specifically, the Examiner contends that “a plurality of shelves” is taught by elements 800A-800E, “each shelf” is taught by element 800A, “a carrier” by elements 800A and 560, “an interconnect member” by element 560, “a plurality of

stacks” by 900A, 800A-E, 900B, 1010A-D, and 1040A-B, “the switching modules” again by elements 800A-E. Applicant respectfully disagrees.

Doblar teaches, at column 12, line 63 – column 13, line 2,

FIG. 10 illustrates the physical positioning of the various circuit boards described above. As noted above, the arrangement of the various circuit boards may provide a centerplaneless computer system design. Computer system 10 includes five switch boards labeled 800A-E, two power boards labeled 900A and 900B, four client boards labeled 1010A-D and two service processor boards labeled 1040A-B.

Doblar teaches a “centerplaneless computer system design” which includes five switch boards 800A-E, two power boards 900A-B, four client boards 1010A-D, and two service processor boards 1040A-B. Applicant notes that Doblar fails to teach or suggest “a plurality of shelves, each shelf having a carrier for removably receiving a plurality of information processing modules and a switching module” as recited by claim 1. In Doblar, the client boards 1010A-D and switch boards 800A-E are not included within “a plurality of shelves, each shelf having a carrier” (see FIGS. 10-11B).

In addition, Doblar fails to teach “wherein the shelves are logically connected into a plurality of stacks, the switching modules of the respective shelves in each stack being interconnected in a logical stacking configuration” as recited by claim 1. Doblar teaches that the “centerplaneless computer system design” includes various types of circuit boards (i.e., switch board, client boards, etc.). However, Doblar fails to teach that a plurality of circuit boards are included within “a plurality of shelves” and that “the shelves are logically connected into a plurality of stacks” as recited in claim 1 and defined in Applicant’s Specification.

Furthermore, claim 1 recites, in part, “the computer system further comprising a shelf having a carrier for removably receiving a master switching module, wherein the master switching module is connected into each stack as a common master switch for all of the stacks”. The Examiner contends that these features of claim 1 are taught in FIG. 1

of Kaplan. Applicant respectfully disagrees. While Figure 1 of Kaplan teaches a master unit 25 connected to multiple slave units 27, Kaplan fails to teach or suggest “a shelf having a carrier for removably receiving a master switching module”. Also, FIG. 1 of Kaplan fails to teach “the master switching module is connected into each stack as a common master switch for all of the stacks”.

Accordingly, claim 1 is believed to patentably distinguish over the cited references, whether alone or combined. Claims 2-31 are dependent upon claim 1 and are therefore believed to patentably distinguish over the cited references, whether alone or combined, for at least the same reasons.

Likewise, claim 32 recites features similar to those highlighted above with regard to claim 1 and is therefore believed to patentably distinguish over the cited references, whether alone or combined, for at least the reasons given in the above paragraphs discussing claim 1.

Applicant respectfully requests examination of new claims 41 and 42, which are believed to patentably distinguish over the cited references, whether alone or combined. Support for claim 41 may be found at least on page 32, lines 21-30 and Figures 11 and 14. Support for claim 42 may be found at least in the original claims and on page 32, lines 21-30 and Figures 11 and 14.

Additionally, applicant submits that Doblar, Kaplan, and Branscomb, whether alone or combined, fail to teach or suggest, “wherein the logical stacking configuration is a closed loop stacking configuration” as recited by claim 2. The Examiner contends that Figures 2 and 10-11B of Doblar teach the features of claim 2. Applicant respectfully disagrees. Applicant submits that Doblar does not teach the above-highlighted features of claims 2. Accordingly, claim 2 is believed to patentably distinguish over the cited references, whether alone or combined.

Applicant submits that Doblar, Kaplan, and Branscomb, whether alone or

combined, fail to teach or suggest, “wherein each switching module of each shelf is connected into a different logical stacking arrangement to the other switching module of that shelf” as recited by claim 14, and “wherein each shelf is connected into two logical stacking arrangements, each switching module of the shelf being connected into a different one of the logical stacking arrangements, and wherein the each logical stacking arrangements provides equivalent connectivity between the shelves as the other logical stacking arrangement” as recited by claim 15. The Examiner contends that the Figures of Doblar teach the features of claims 14 and 15. Applicant respectfully disagrees. First, as previously argued, Doblar fails to teach a plurality of shelves and the shelves logically connected into a plurality of stacks. Second, Doblar fails to teach different logical stacking arrangements for each switching module of each shelf. Accordingly, claims 14 and 15 are believed to patentably distinguish over the cited references, whether alone or combined.

Applicant submits that Doblar, Kaplan, and Branscomb, whether alone or combined, fail to teach or suggest, “wherein one switching module of each shelf is operable as a shelf level master switching module and wherein the other switching module of that shelf is operable as a shelf level slave switching module” as recited by claim 17. The Examiner contends that Figure 2 of Doblar teaches the features of claim 17. Applicant respectfully disagrees. First, as previously argued, Doblar fails to teach a plurality of shelves. Second, Doblar fails to teach having both a master switching module and a slave switching module within each shelf. Accordingly, claim 17 is believed to patentably distinguish over the cited references, whether alone or combined.

Applicant submits that Doblar, Kaplan, and Branscomb, whether alone or combined, fail to teach or suggest, “wherein each switching module comprises at least one forwarding element for performing a forwarding operation and a respective controlling element for controlling the forwarding element” as recited by claim 25. The Examiner contends that Figures 2 and 10-11B of Doblar teach the features of claim 25. Applicant respectfully disagrees. Doblar fails to teach each switching module having

both a forwarding element and a respective controlling element. Accordingly, claim 25 is believed to patentably distinguish over the cited references, whether alone or combined.

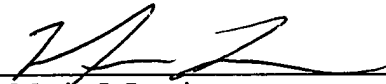
Applicant further submits that Doblar, Kaplan, and Branscomb, whether alone or combined, fail to teach or suggest, “wherein each switching module is content aware” as recited by claim 30, and “wherein the controlling element is operable to study a transmitted data element to determine a path to destination based on the content of that data element” as recited by claim 31. Accordingly, claims 30 and 31 are believed to patentably distinguish over the cited references, whether alone or combined.

**CONCLUSION**

Applicants submit the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-70800/MJL.

Respectfully submitted,



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